

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TRUSTEES OF THE SUBURBAN TEAMSTERS)
OF NORTHERN ILLINOIS PENSION FUND)
AND WELFARE FUNDS,)
Plaintiff,)
v.) No. 08 C 1015
FLEET LINE TRUCKING)
INCORPORATED, an Illinois corporation and) Magistrate Judge Keys
DONNELL LANGSTON, Individually)
Defendants.)

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for entry of a default judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on February 19, 2008 for collection of delinquent contributions, attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Corporate service was made upon FLEET LINE TRUCKING, INCORPORATED, an Illinois corporation on February 26, 2008 and a copy of the proof of service was filed with the court on March 24, 2008.
3. Service was made upon DONNELL LANGSTON, Individually on February 26, 2008 and a copy of the proof of service was filed with the court on March 24, 2008.

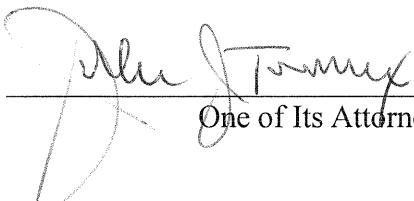
4. Defendants are now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$6,141.76 Pension
\$11,350.36 Welfare
\$3,352.23 Welfare installment note
\$1,257.40 Pension installment note
\$925.00 Attorneys fees
\$416.00 Court costs
\$23,442.75

WHEREFORE, Plaintiff prays for the entry of judgment against Defendants, FLEET LINE TRUCKING, INCORPORATED, an Illinois corporation and DONNELL LANGSTON, Individually, jointly and severally, and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS in the amount of \$23,442.75.

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS WELFARE AND
PENSION FUNDS

By:



John J. Toomey
One of Its Attorneys

JOHN J. TOOMEY
ARNOLD AND KADJAN
19 W. Jackson Boulevard
Chicago, Illinois 60604
(312) 236-0415